

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to: *Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*, 04-cv-1076 (GBD)(SN)

**MOTION TO ADD ONE ADDITIONAL PLAINTIFF AGAINST THE TALIBAN**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq., along with the exhibit attached thereto, plaintiff Maribeth Eccleston, by and through counsel, respectfully moves that this Court:

1. Order that the underlying complaint is deemed amended to add one plaintiff, Maribeth Eccleston, against the Taliban;
2. Order that the amendment supplements by incorporation into, but does not displace, the underlying complaint;
3. Order that prior service, orders, and judgments entered in the case remain in effect as to all parties;
4. Order that all parties are bound by all prior rulings made in this case, including the Court's prior order on service by publication, ECF Nos. 445, 488;
5. Order that Case Management Order #2, ECF No. 247, ¶ 12 applies to the additional plaintiff such that re-service of the Taliban is not required;
6. Order that the additional plaintiff shall file the Third Amended First Consolidated Complaint (*see* Exhibit A to the Declaration of Jerry S. Goldman, Esq.) as a stand-alone document within two days of this Order; and
7. Granting such other and further relief that the Court deems just and proper.

Dated: New York, New York  
June 27, 2022

Respectfully submitted,

/s/ Jerry S. Goldman

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